

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	NO. 07 CR 792
	)	
KEITH WILSON,	)	Honorable Joan B. Gottschall
	)	District Judge, Presiding
Defendant.	)	

MOTION TO REQUIRE NOTICE OF INTENTION TO USE  
OTHER CRIMES, WRONGS, OR ACTS EVIDENCE

NOW COMES the Defendant, KEITH WILSON, by and through his attorney, STEPHEN M. KOMIE of KOMIE AND ASSOCIATES, and respectfully moves this Honorable Court for an order pursuant to Rule 12(d)(2) of the Federal Rules of Criminal Procedure and Rules 104(a) and (c) of the Federal Rules of Evidence, requiring the Government to give notice of its intention to use at the trial of the instant matter, either in its direct case, during the cross-examination of a Defendant, or in its rebuttal case, the following:

1. Evidence of "other crimes, wrongs, or acts" of any Defendant, as that phrase is used in Fed.R.Evd. 404(b).

(a) In regard to said notice, the Government should identify and described:

- (I) The dates, times, places and persons involved  
in said other crimes, wrongs, or acts;
- (ii) The statements of each participant in said  
other crimes, wrongs, or acts;
- (iii) The documents which contain or evidence said  
other crimes, wrongs, or acts, including when  
the documents were prepared, who prepared the  
documents and who has possession of the

documents; and

- (iv) The issue or issues on which the Government believed such other crimes, wrongs, or acts evidence is relevant within Fed.R.Evd. 404(b).

2. Evidence of "specific instances of conduct" of any Defendant as that phrase is used in Fed.R.Evd. 608(b).

- (a) In regard to said notice, the Government should identify and describe:
  - (I) The dates, times, places and persons involved in said specific acts of misconduct;
  - (ii) The statements of each participant in said specific acts of misconduct;
  - (iii) The documents which contain or evidence said specific acts of misconduct, including when the documents were prepared, who prepared the documents, and who has possession of the documents.

WHEREFORE the Defendant respectfully requests this Court enter an order requiring the Government to give notice of its intention to use other crimes, wrongs, or acts as evidence.

Respectfully submitted,

KEITH WILSON, Defendant  
by and through his attorneys,  
KOMIE AND ASSOCIATES

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